

# **Exhibit A**

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27 UNITED STATES DISTRICT COURT  
28 NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

29 CHASOM BROWN, MARIA NGUYEN,  
30 WILLIAM BYATT, JEREMY DAVIS, and  
31 CHRISTOPHER CASTILLO, individually  
32 and on behalf of all other similarly situated,

33 Plaintiffs,

34 vs.

35 GOOGLE LLC,

36 Defendant.

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Case No.: 5:20-cv-03664-LHK

**[PROPOSED] ORDER RE:  
PLAINTIFFS' PROPOSED SECOND  
MODIFIED STIPULATED ORDER RE:  
DISCOVERY OF ELECTRONICALLY  
STORED INFORMATION FOR  
STANDARD LITIGATION**

**[PROPOSED] ORDER**

Before the Court is Plaintiffs' Proposed Second Modified Stipulated Order Re: Discovery of Electronically Stored Information for Standard Litigation ("Plaintiffs' Proposal"). Having considered the parties' letter briefs filed in support of and in opposition to Plaintiffs' Proposal, argument by counsel, and all other matters properly considered by this Court, the Court finds there is good cause to **SO-ORDER** Plaintiffs' Proposal.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

Honorable Susan van Keulen  
United States Magistrate Judge

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, MARIA NGUYEN,  
WILLIAM BYATT, JEREMY DAVIS, and  
CHRISTOPHER CASTILLO, individually  
and on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**[GOOGLE PROPOSED] ORDER  
DENYING PLAINTIFFS' PROPOSED  
SECOND MODIFIED STIPULATED  
ORDER RE: DISCOVERY OF  
ELECTRONICALLY STORED  
INFORMATION FOR STANDARD  
LITIGATION**

Referral: Susan van Keulen, USMJ

**[GOOGLE PROPOSED] ORDER**

Before the Court is Plaintiffs' Proposed Second Modified Stipulated Order Re: Discovery of Electronically Stored Information for Standard Litigation ("Plaintiffs' Proposed Second Modified ESI Protocol"). Having considered the parties' papers filed in support and in opposition to the Plaintiffs' Proposed Second Modified ESI Protocol, and all other matters properly considered by this Court, the Court hereby **DENIES** Plaintiffs' Proposed Second Modified ESI Protocol.

**THEREFORE, IT IS ORDERED** that Plaintiffs' Proposed Second Modified ESI Protocol is **DENIED**.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2021

\_\_\_\_\_  
Hon. Susan van Keulen  
United States Magistrate Judge